

17  
SEP 21 1984

Mr. John P. Goetz  
Chief, Hazardous Waste Management Section  
Kansas Department of Health and Environment  
Building 321, Forbes Field  
Topeka, Kansas 66620

RE: Olin Water Services, Olin Corporation

Dear Mr. Goetz:

Enclosed you will find the administrative record including a copy of the public notice which announces the Environmental Protection Agency (EPA) Region VII office's intent to issue a RCRA hazardous waste permit for Olin Water Services, Olin Corporation in Kansas City, Kansas.

Please display this administrative record for public observation from September 26, 1984 through November 13, 1984, between the hours of 8 a.m. and 4:30 p.m.

We ask that you send any comments received regarding these proposed actions to this office at the end of the public observation period. Any questions regarding this letter should be directed to Richard Ferguson or Karen Flournoy at (816) 374-6531. Thank you for your efforts in displaying this administrative record.

Sincerely yours,

Lyndell L. Harrington, P.E.  
Chief, Permits Section  
Waste Management Branch  
Air and Waste Management Division

Enclosure



R00011180

RCRA Records Center

Acc 01

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PERM  
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Ferguson  
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KFlournoy  
KAF  
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PERM  
Harrington

LH  
9-19

WMBR  
Morby

WMBR  
9/19/84

INDEX TO ADMINISTRATIVE RECORD FOR  
OLIN WATER SERVICES - OLIN CORPORATION

Copy of Kansas Federal Register Notice

Copy of Newspaper Public Notice published in Kansas City Kansan

Copy of Radio Public Notice broadcast on KFKF and KCKM

Fact Sheet for Olin Water Services - Olin Corporation

Draft Modified Permit with Modified Attachments

May 22, 1987 - Olin Water Services initial request and rationale for permit modification.

October 23, 1987 - KDHE comment letter on requested modifications.

November 18, 1987 - Olin Water Services letter transmitting revised pages for permit application.

November 23, 1987 - KDHE letter transmitting requested modifications to EPA for review and comment.

December 18, 1987 - KDHE transmittal of draft modified permit and administrative record to Olin Water Services.

Department of Health and Environment  
Intent to Modify Hazardous Waste Storage Facility Permit

DECEMBER 18, 1987  
PUBLIC NOTICE

The Kansas Department of Health and Environment (KDHE), Forbes Field, Topeka, Kansas 66620, is today providing public notice that they may modify the hazardous waste storage permit issued to Olin Water Services - Olin Corporation, 3155 Fiberglass Road, Kansas City, Kansas. The modifications would allow Olin Water Services to store drums by a linear height limitation rather than a number of stacked pallets limitation and to conduct some inspections less frequently.

Olin Water Services was originally issued a hazardous waste facility permits in 1985. On October 17, 1985, KDHE received final authorization from EPA to implement the state's hazardous waste management program in lieu of the federal program. The state's final authorization included all portions of the Resource Conservation and Recovery Act (RCRA), except those covered by the Hazardous and Solid Waste Amendments of 1984 (HSWA). The permit modifications Olin Water Services has requested are not covered by HSWA. Thus, KDHE is solely authorized to modify the original KDHE permit.

Copies of the administrative record, which include the draft modified permit, the modified permit application, and all information submitted by Olin Water Services, are available for public review starting December 18, 1987 at the EPA Region VII Headquarters, 726 Minnesota Avenue, Kansas City, Kansas, from 7:30 a.m. to 4:30 p.m., weekdays; and the KDHE, Building 730, Forbes Field, Topeka, Kansas, and the KDHE District Office, 808 West 24th Street, Lawrence, Kansas, from 8:00 a.m. to 4:30 p.m., weekdays.

Comments on the proposed permit modifications may be directed in writing to Mr. John Goetz, Hazardous Waste Section, KDHE, Topeka, Kansas 66620. Comments must be submitted in writing prior to February 1, 1988. Requests for additional information, including the fact sheet, may be made by telephone by contacting KDHE at (913) 296-1607.

A public hearing has not been scheduled; however, if requests are received which indicate a significant degree of public interest in this draft permit, a public hearing will be scheduled. Requests for a public hearing shall be in writing to the address listed for submittal of comments and shall state the nature of issues proposed to be raised at the hearing. Such requests shall be submitted prior to January 19, 1988.

After consideration of all comments received and of the requirements of RCRA and state statutes, KDHE will make a final permit decision. If the decision is made to issue the modified permit which is substantially unchanged from the draft made available for public comments as announced by this notice, the KDHE Secretary will notify all persons submitting comments or

requesting notice of final decision. If the draft modified permit is substantially changed, the KDHE Secretary will jointly issue a public notice indicating the revised decisions.

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Stanley C. Grant, Ph.D., Secretary  
Department of Health and Environment

## PUBLIC NOTICE

THE KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT (KDHE), FORBES FIELD, TOPEKA, KANSAS 66620, IS TODAY PROVIDING PUBLIC NOTICE THAT THEY MAY MODIFY THE HAZARDOUS WASTE STORAGE PERMIT ISSUED TO OLIN WATER SERVICES- OLIN CORPORATION, 3155 FIBERGLASS ROAD, KANSAS CITY, KANSAS. THE MODIFICATIONS WOULD ALLOW OLIN WATER SERVICES TO STORE DRUMS BY A LINEAR HEIGHT LIMITATION RATHER THAN A NUMBER OF STACKED PALLETS LIMITATION AND TO CONDUCT SOME INSPECTIONS LESS FREQUENTLY.

Olin Water Services was originally issued a hazardous waste facility permit in 1985. On October 17, 1985, KDHE received final authorization from EPA to implement the state's hazardous waste management program in lieu of the federal program. The state's final authorization included all portions of the Resource Conservation and Recovery Act (RCRA), except those covered by the Hazardous and Solid Waste Amendments of 1984 (HSWA). The permit modifications Olin Water Services has requested are not covered by HSWA. Thus, KDHE is solely authorized to modify the original KDHE permit.

Copies of the administrative record, which include the draft modified permit, the modified permit application, and all information submitted by Olin Water Services, are available for public review starting December 18, 1987 at the EPA Region VII Headquarters, 726 Minnesota Avenue, Kansas City, Kansas from 7:30 a.m. to 4:30 p.m., weekdays; and the KDHE, Building 730, Forbes Field, Topeka, Kansas, and the KDHE District Office, 808 West 24th Street, Lawrence, Kansas, from 8:00 a.m. to 4:30 p.m., weekdays.

Comments on the proposed permit modifications may be directed in writing to Mr. John Paul Goetz, Hazardous Waste Section, KDHE, Topeka, Kansas 66620. Comments must be submitted in writing prior to February 1, 1988. Requests for additional information, including the fact sheet, may be made by telephone by contacting KDHE at (913) 296-1607.

A public hearing has not been scheduled; however, if requests are received which indicate a significant degree of public interest in this draft permit, a public hearing will be scheduled. Requests for a public hearing shall be in writing to the address listed for submittal of comments and shall state the nature of issues proposed to be raised at the hearing. Such requests shall be submitted prior to January 19, 1988.

After consideration of all comments received and of the requirements of RCRA and state statutes, KDHE will make a final permit decision. If the decision is made to issue the modified permit which is substantially unchanged from the draft made available for public comments as announced by this notice, the KDHE Secretary will notify all persons submitting comments or requesting notice of final decision. If the draft modified permit is substantially changed, the KDHE Secretary will jointly issue a public notice indicating the revised decisions.

## PUBLIC NOTICE FOR RADIO BROADCAST

THE KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT ANNOUNCED TODAY THAT THE HAZARDOUS WASTE STORAGE PERMIT ISSUED TO OLIN WATER SERVICES - OLIN CORPORATION IN KANSAS CITY, KANSAS MAY BE MODIFIED. THE MODIFICATIONS WOULD ALLOW OLIN WATER SERVICES TO STORE DRUMS BY A LINEAR HEIGHT LIMITATION AND TO CONDUCT SOME INSPECTIONS LESS FREQUENTLY.

THE NOTICE OF INTENT AND DRAFT PERMIT ARE AVAILABLE FOR REVIEW AT THE K.D.H.E. LAWRENCE AND TOPEKA OFFICES, AND E.P.A. REGION VII OFFICE IN KANSAS CITY, KANSAS.

IF SUFFICIENT PUBLIC INTEREST IS DISPLAYED, A PUBLIC HEARING MAY BE HELD. MORE INFORMATION MAY BE OBTAINED FROM JOHN GOETZ OF K.D.H.E., AT (913) 296-1607. WRITTEN COMMENTS MUST BE RECEIVED BY K.D.H.E. BEFORE FEBRUARY 1, 1988.



FACT SHEET  
FOR

OLIN WATER SERVICES - OLIN CORPORATION  
OLIN CORPORATION  
KANSAS CITY, KANSAS

EPA I.D. NUMBER KSD000203638

DECEMBER 18, 1987

This fact sheet, in accordance with the requirements of 40 CFR 124.8, has been prepared for draft permit modifications that the Kansas Department of Health and Environment (KDHE) may incorporate into Olin Water Service - Olin Corporation's existing Resource Conservation and Recovery Act (RCRA) hazardous waste storage facility permit. The modifications would allow Olin Water Services to store drums by a linear height limitation rather than a number of stacked pallets limitation and to conduct some inspections less frequently. These proposed modifications are considered as major modifications to an existing permit and all procedures of 40 CFR 270.41 are required to be implemented during the modification process. A draft permit, incorporating these modifications, has been prepared.

I. Purpose of the Permitting Process and Public Comment Period

The purpose of the permitting process and public comment period is to afford interested citizens and governmental agencies the opportunity to evaluate the conditions specified in the draft permit.

As part of the permitting process, KDHE must determine the ability of the applicant, Olin Water Services - Olin Corporation, to comply with all applicable hazardous waste management requirements promulgated under RCRA and Kansas Statutes Annotated 65-3431(i) and 65-3431(s). KDHE is then required to prepare a draft modified permit that sets forth in a concise document all of the applicable requirements which KDHE intends the permittee to comply with during the duration of the original permit. The public will be given forty-five (45) days to review the modified permit application and the draft modified permit prior to KDHE taking any final action on the permit. During this time, the public may comment on the conditions which are to be modified.

A public hearing has not been scheduled; however, if requests are received which indicate a significant degree of public interest in the draft permit, a public hearing will be scheduled. Requests shall be in writing and shall state the nature of issues to be raised at the hearing. Any requests for a hearing must be received by January 19, 1988.

## II. Procedures for Reaching a Final Decision

Olin Water Services was originally issued a hazardous waste storage facility permit in 1985. On October 17, 1985, Kansas received final authorization from EPA to implement the State's hazardous waste management program, in lieu of the federal program. The State's authorization included all portions of RCRA, except those covered by the 1984 Hazardous and Solid Waste Amendments (HSWA). The modifications proposed for Olin Water Services existing permit are not covered by HSWA. Thus, KDHE is solely authorized to modify the original KDHE permit.

Section 7004(b) of RCRA and 40 CFR 124.10 require that the public be given at least forty-five days to comment on each draft permit prepared under the Resource Conservation and Recovery Act. The comment period will begin on the date of publication of the public notice in the Kansas City Kansan and broadcast on radio stations KFKF-FM and KCKM-AM on December 18, 1987 and will end on February 1, 1988. Anyone interested in commenting on the modified permit application or the draft modified permit must do so within the permit comment period discussed above. Anyone interested in requesting a public hearing must do so prior to January 19, 1988.

All persons wishing to comment on the modified permit application or on the modified draft permit should submit comments in writing to:

John Paul Goetz, P.E., Chief  
Hazardous Waste Section  
Bureau of Waste Management  
Kansas Department of Health and Environment  
Forbes Field, Building 730  
Topeka, Kansas 66620  
(913) 296-1607

The KDHE Secretary will make the determination regarding the modification of the existing state hazardous waste management facility permit at the close of the public comment period. The Secretary will consider all written comments received during the public comment period, the comments received at the public hearing if one is held, and the requirements of all state and federal hazardous waste regulations and policies.

When the KDHE Secretary makes the final permit decision, notice will be given to the applicant, all persons who submitted written comments, those who commented at the public hearing, and those who requested notice of the final permit decisions. If none of the comments received request a change in the conditions specified in the draft modified permit, the permit will become effective immediately upon issuance of the permit. If comments received during the public comment period request changes in the modified conditions specified in the draft permit, the permit will become effective thirty (30) days after service of notice of the decision, or at a later date, if a review is requested under 40 CFR 124.19.

The administrative record, which includes the modified permit application, the draft modified permit, and relevant correspondence, is available for public review at the following locations:

Kansas Department of Health and Environment

Central Office  
Bureau of Waste Management  
Forbes Field, Building 730  
Topeka, Kansas 66620  
(913) 296-1607

Lawrence District Office  
808 West 24th Street  
Lawrence, Kansas 66046  
(913) 842-4600

U.S. Environmental Protection Agency

Region VII Office  
726 Minnesota Avenue  
Kansas City, Kansas 66101

III. Facility Description

Olin Water Services has a RCRA hazardous waste permit to operate a storage facility in Kansas City, Kansas. Olin Water Services stores waste classified as hazardous waste from the preparation of liquid and powder water treatment formulations. These wastes are stored in a maximum of 200 fifty-five (55) gallon drums meeting the U.S. Department of Transportation specifications in a storage area which provides secondary containment. Emergency equipment is available at or near the storage area and appropriate warning signs are posted.

The modifications which may be incorporated into Olin Water Services current permit are summarized below.

The general description of the facility would be modified to reflect a linear height limitation rather than the number of stacked drums limitation in the present permit. The description of the containment system would be corrected regarding the stacking height limitation to make it consistent with the general description of the facility. The inspection schedule frequency of the condition of containers would be changed from daily to weekly, the inspection frequency of the amount of aisle space between containers would be changed from daily to weekly, and the inspection schedule frequency of the condition of emergency equipment would be changed from weekly to monthly. The inspection frequency of the emergency equipment log would be changed from weekly to monthly. The column for aisle space from the containment system inspection log would be placed on the inspection log for containers. The inspection frequency for the containers log would be changed from daily to weekly.

#### IV. Permit Organization

The EPA permit is organized in the following manner:

<u>Section</u>	<u>Description</u>
Cover Sheet	Sets forth basic legal authority
Section I - Standard Conditions	General permit conditions which are the regulatory requirements specified in 40 CFR 270
Section II - General Facility Conditions	General facility permit conditions which are the regulatory requirements specified in 40 CFR 264
Section III - Storage in Containers	Specific operating conditions, limitations, procedures, and requirements which implement the regulatory requirements of 40 CFR 264, Subpart I

#### V. Brief Summary of the Permit Conditions

In Section I of the permit, standard conditions which are included in all RCRA permits are specified. These include many duties and requirements which, for example, require the permittee to comply with all permit conditions, provide relevant information to EPA and KDHE when requested, properly operate and maintain all facilities, conduct monitoring and record results, and notify EPA and KDHE of any changes which would alter the facility.

In Section II, general facility conditions are specified. Conditions in this section require the permittee to design and operate the facility properly, inspect equipment regularly, analyze the waste so proper storage will be provided, and be prepared to handle an emergency if it should arise.

Specific performance standards are provided in Section III. This limits the storage of hazardous wastes to those specified. The permittee is also required to properly manage the containers and inspect the containers and container storage area. Closure of the facility must take place in an environmentally sound manner.

#### VI. Waivers

Olin Water Services has not requested additional waivers in the proposed permit modifications.

dl/olinfs.jjr

STATE OF KANSAS  
DEPARTMENT OF HEALTH AND ENVIRONMENT  
DIVISION OF ENVIRONMENT

DRAFT

PERMIT NUMBER KSD000203638

In accordance with the provision of Kansas Statutes Annotated 65-3430 et seq.

PERMISSION IS HEREBY GRANTED

to Olin Water Services - Olin Corporation, I.D. Number KSD000203638 (herein called the Permittee) to operate a hazardous waste storage facility located in Kansas City, Kansas at 3155 Fiberglass Road, at latitude 39° 08' 47" and longitude 94° 36' 58" in accordance with rules and regulations of the Department of Health and Environment, (herein called the Secretary or the Department) and the following named conditions and requirements to wit.

The Permittee must comply with all terms and conditions of the Kansas Hazardous Waste Facility Permit issued on March 6, 1985 and this modified permit. This permit consists of the conditions contained herein (including those in any attachments). Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR Section 270.32(c))

This permit is based on the assumption that the information submitted in the modified permit application received on May 22, 1987 as modified by subsequent amendments and letters dated November 18, 1987 (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR 270.41, 270.42 and 270.43) and potential enforcement action. The Permittee must inform the Kansas Department of Health and Environment of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall become effective at Midnight on \_\_\_\_\_ and shall remain in effect until April 7, 1995, unless revoked and reissued, or terminated (40 CFR 270.41 and 270.43) or continued in accordance with 270.51(a).

Done at Topeka, this \_\_\_\_\_ day of February, 1988

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Stanley C. Grant, Ph.D., Secretary  
Department of Health and Environment

(revised 11/87)

270.14(b)(1): A general description of the facility.

The facility is a hazardous waste drum storage area in a detached building in the production yard of the Olin Water Services Plant. The floor of the building is a reinforced concrete slab surrounded on three sides by concrete block walls and covered by a steel roof with clear panels for lighting. The north side of the building is open and has a six foot wide ramp along the entire length which rises nine inches to the building floor. The building floor is sloped away from the entrance ramp to a sump along the back wall. The drums will be stored on four foot pallets in four rows five pallets deep with aisles on either side of the rows and stacked at a height not to exceed twelve (12) feet. Ignitable and reactive wastes will be stored in the outside rows. Aqueous wastes will be stored in the two middle rows. The total number of drums stored in the facility will not exceed 200-55 gallon drums. A design drawing of the facility is included in Section 270.15(a)(1).

ATTACHMENT II  
INSPECTION SCHEDULE

270.14(b)(5): A copy of the general inspection schedule required by Section  
164.15(b)....

## GENERAL INSPECTION SCHEDULE

- I. Procedures and Responsibilities
  - A. General inspection frequency: weekly
  - B. Individuals authorized to conduct inspection in order of alternate service:
    - 1. Production supervisor.
    - 2. Plant manager.
  - C. Inspectors to record observations and date/nature of repairs or other remedial actions on "WASTE AREA INSPECTION LOG" (see attachment).
- II. Items to be inspected and frequency of inspections
  - A. Condition of containers: weekly
    - 1. Leaks.
    - 2. Deterioration.
    - 3. Stability of stacking arrangements and condition of pallets.
  - B. Containment System: daily
    - 1. General condition of containment curbs, floor and sump.
    - 2. Condition of sump pump.
  - C. Amount of aisle space between containers: weekly
  - D. Condition of emergency equipment: monthly
    - 1. Fire hoses and fire extinguishers.
    - 2. Siren alarms.
    - 3. Emergency showers and eye wash stations.
    - 4. Scott Air Packs.
    - 5. Liquid vacuum equipment.
- III. Items inspected by outside contractors/suppliers and frequency of inspections
  - A. Fire hoses and fire extinguishers: yearly
  - B. Sprinkler system: yearly



#### IV. Inspection log

- A. Information to be included in the inspection record should include date, time of inspection, name of inspector, a notation of observations made, date and nature of any repairs or other remedial actions.
- B. This record will be maintained in the Production Supervisor's office and kept for a minimum of three years from the date of the inspection.

#### V. Handling of deteriorated, damaged, or leaking containers.

- A. In the event that a drum is noted during an inspection, or any other time, to be in a deteriorated condition such as to pose a possible health or environmental hazard, the drum is to be moved out of the storage area, the contents are to be repackaged in a suitable container, and the new drum is to be placed in the waste storage area.
- B. Spills or leaking containers are to be handled in accordance with the Spill Control Procedure.

Revised 11/87

pg. 1

## EMERGENCY EQUIPMENT

## INSPECTION FREQUENCY:

MONTHLY

[illegible]



## CONTAINERS

**INSPECTION FREQUENCY** **1 WEEKLY**

**WEEKLY**[illegible]

**COMMENTS:**

ADT - Sprinkler System Inspection - once/month  
EDCOR - Fire Extinguisher Inspection - yearly

ATTACHMENT VI

CONTAINER STORAGE AREA SPECIFICATIONS  
AND OPERATING PROCEDURES

(revised 11/87)

270.15(a) : A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

- (1) Basic design parameters, dimensions, and materials of construction. See accompanying design drawing. The facility will be constructed to comply with local building codes. A construction schedule is attached.

The proposed storage facility is designed to physically and structurally hold an area four pallets wide by five pallets deep (pallets are four feet by four feet). The pallets may be stacked to a height not to exceed twelve (12) feet. The total number of drums stored in the facility will not exceed 200-55 gallon drums.

The overall dimensions of the facility will be about 31 by 26 feet and the area available for storage will be about 25 by 24 feet.

The slab and sump will be constructed of concrete reinforced with carbon steel wire mesh. The sump cover will be a carbon steel grate. The access ramp will be asphalt.

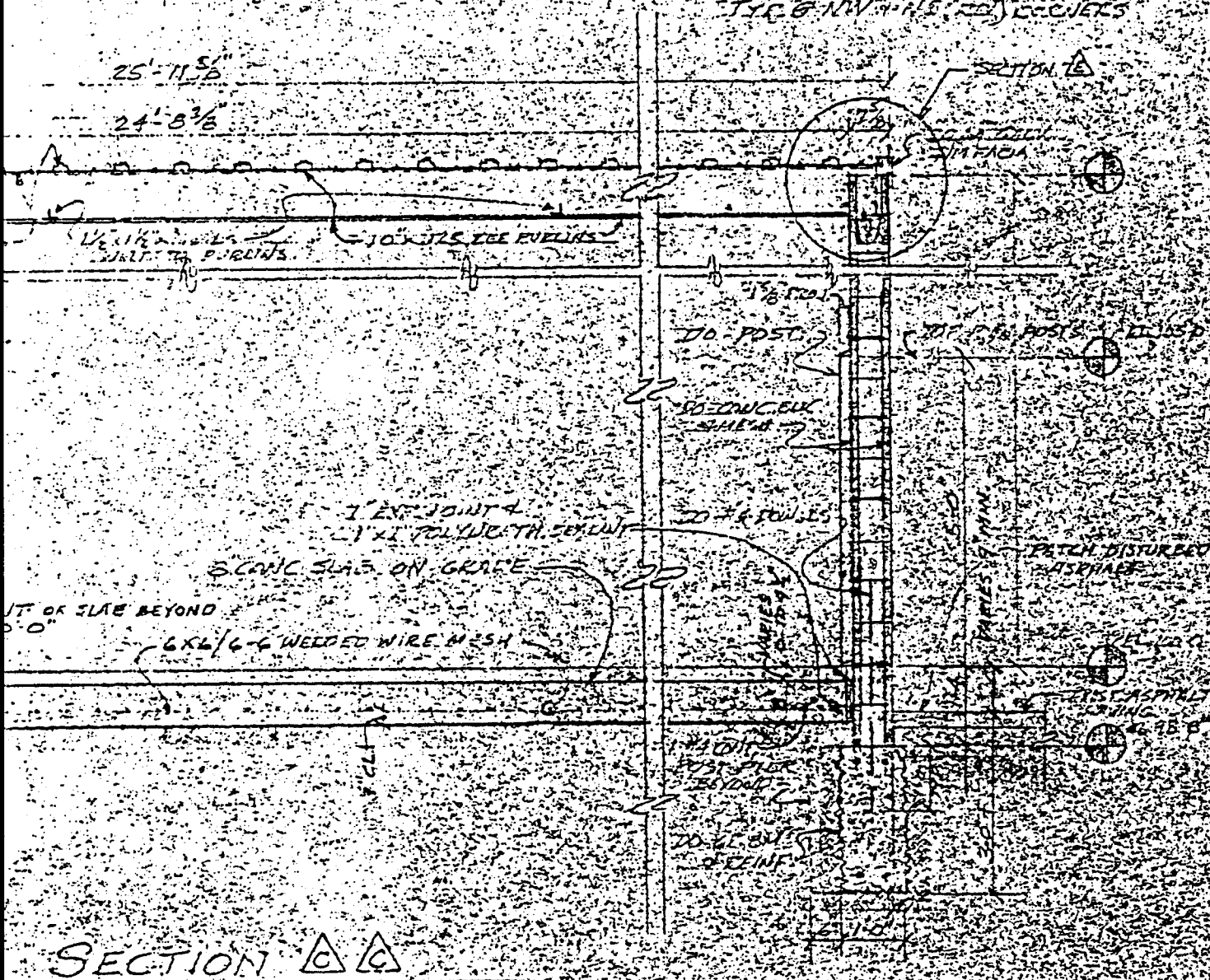
See Part B

# SECTION A-A

1/2" = 1'-0"

# SECTION A-A

1/2" = 1'-0"



# SECTION A-A

1/2" = 1'-0"

## OLIN WATER SERVICES

DIVISION OF OLIN CORPORATION

SCALE AS INDIC.

APPROVED BY:

DRAWN BY: R.T.S.

DATE: 2/10/83

REVISED: 8/8/84 9/8/84

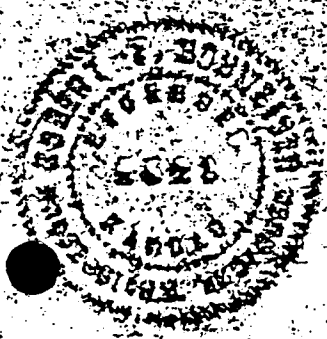
K.C. HAZARDOUS WASTE CONTAINMENT STRUCTURE

3755 FIBERGLAS ROAD KANSAS CITY, KANSAS

PLANS & SECTIONS

DRAWING NUMBER

1 OF 1





Waste Storage Area - Project Construction Schedule

Major milestones for the construction of the Hazardous Waste Containment Area are as follows:

<u>Action Item</u>	<u>Estimated Completion Date</u> (weeks after Part B approval)
1. Solicit bids from outside contractors based on specifications of approved design drawings.	1 week
2. Obtain capital funding from Olin Corporate parent.	8 weeks
3. Award construction contract	10 weeks
4. Begin construction	11 weeks
5. Construction complete with waste storage area operational	17 weeks

PROJECT SCHEDULE SHEET

Covering WASTE STORAGE AREA Status as of 9/13/84

Distribution: EPA REGION VII, KDHE, R. HENDEY, B. MADSEN, L. PRUDY Reported by G. JENKINS

Plant KANSAS CITY Project(s) \_\_\_\_\_

By \_\_\_\_\_ With \_\_\_\_\_

Date \_\_\_\_\_ Sheet 1 of 1

[illegible]

Gantt Chart Code: ☐ Date work scheduled to start    ☐ Date work scheduled to finish    ☐ Total time scheduled for work    ☐ Amount of work done  
(Each vertical period represents one unit of time. Use Gantt Chart Code or enter numbers and/or other indicators.)

270.15(a) : A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

- (2) How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system.

The design promotes drainage by sloping the concrete slab away from the access ramp and to the sump. Containers will be protected from standing liquid by the large volume of sump containment available and by being on pallets.

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

- (3) Capacity of the containment system relative to the number and volume of containers to be stored.

The capacity of the storage facility is for 11,000 gallons of free liquid. The actual capacity of the containment system is for approximately 2,250 gallons of free liquid, or approximately 20 percent of the storage facility capacity. This containment system capacity is sufficient to provide for collection of 10 percent of the storage facility's free liquid capacity in addition to the blow-in from a nine inch rain.

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

(4) Provisions for preventing or managing run-on.

Run-on is prevented by a continuous ring of protection consisting of three concrete block walls on the south, east, and west sides of the facility and an access ramp up to nine inches on the north side of the facility:

270.15(a): A description of the containment system to demonstrate compliance with Section 264.175. Show at least the following:

- (5) How accumulated liquids can be analyzed and removed to prevent overflow:

Should liquid accumulate in the facility's secondary containment system, it will be pumped out to an appropriate container or containers. It will then be analyzed in accordance with the waste analysis plan of Section 270.14(b)(3) of this permit application. If the liquid is determined to be a hazardous waste, it will be managed as such.

The interior slab of the facility is sloped to a trench and sump for storage. Accumulated liquids will be pumped into 55 or 30 gallon container(s) with a portable sump pump. From these container(s) they will be sampled and analyzed as either unknown aqueous or unknown non-aqueous liquids in accordance with the waste analysis plan. The determination of aqueous or non-aqueous character will be based on an assessment of what, if any, component of the accumulated liquid is due to waste container failure.

Each time an accumulation of liquid is removed from the secondary containment structure, a sample will be taken and an analysis will be run. If the hazardous waste analysis described above does not preclude the possibility of discharging the material to the sewer, then it will be analyzed to determine compliance with the sewer discharge parameters and limits in the plant's sewer discharge permit (see Item V of the waste Disposal Record Sheet of the waste analysis plan).

Liquids that meet all sewer discharge limitations may be discharged to the sewer, and liquids that only require pH adjustment to meet all sewer discharge limitations may be discharged to the sewer after the necessary pH adjustment. Such discharge will be by way of pouring or pumping liquids directly from 30 or 55 gallon containers to one of the trench drains inside the plant. If analysis indicates that the liquid exhibits hazardous waste characteristics other than or in addition to corrosivity due to extreme pH, the liquid will be placed into new container(s), if necessary, and stored in the hazardous waste facility prior to shipment to a permitted and approved off-site treatment facility.

270.15(b): For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with Section 264.175(c),....

SECTION NOT APPLICABLE

270.15 (c): Sketches, drawings, or data demonstrating compliance with Section 264.176 (location or buffer zone and containers holding ignitable or reactive wastes) and Section 264.177(c) (location of incompatible wastes), where applicable.

As indicated in the earlier response to 270.14(b)(2) concerning chemical and physical analyses of hazardous wastes to be handled, certain ignitable or ignitable/reactive wastes may at times be placed into storage in the proposed drum storage facility. However, for reasons that have already been accepted by the Kansas Department of Health and Environment as a sound basis for granting an exemption from 40 CFR 265.176 for the existing hazardous waste storage facility, it is believed that a waiver of 40 CFR 264.176 is appropriate for the proposed hazardous waste storage facility. These reasons were stated in the attached October 27, 1981 correspondence from Mr. Wilbur Bradley of Olin Water Services to Mr. Randy Bradley of the Kansas Department of Health and Environment. The exemption from 40 CFR 265.176 was granted by way of the attached letter dated September 24, 1982 from Vivek Kamath of the Kansas Department of Health and Environment to Mr. Wilbur Bradley. The attached January 6, 1983 letter from Mr. Robert Morby of EPA Region VII to Mr. Mark Pelley of Olin Corporation indicates that EPA will in the course of its evaluation of the Part B permit application consider arguments for relief from 40 CFR 264.176 and that such arguments should address alternatives that could meet the intent of the regulation, problems with meeting the buffer zone requirement, and local fire code requirements. The following discussion addresses these areas of concern.

I. Alternatives that could meet the intent of the buffer zone requirement.

As indicated in the materials provided pursuant to 270.15(a)(2) and (3), preceding, the proposed container storage facility is designed to ensure containment of any foreseeable release of hazardous waste. Locating the proposed facility in the same southwest corner that the existing facility is located in would insure that there would be a distance of approximately 68 feet to the nearest building to the south and a distance of about 78 feet to the nearest building to the west. Daily inspections of the drum storage area would detect potential problems relating to container integrity before emergency conditions could develop.

II. Problems with meeting the buffer zone requirement:

In order to provide for adequate aisle space between drums in the storage facility, any practical design would have to specify an area measuring at least twenty feet on each side. If such an area were dedicated for waste storage inside the manufacturing building, it would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency. If such an area were dedicated for waste storage inside the warehouse building to the east of the manufacturing building, it would likewise create crowding.



Furthermore, it is not clear that Olin could secure permission to store hazardous waste in the warehouse which is owned by another party. If drummed waste were moved as far as possible from the property line without being relocated to within the production or warehouse buildings and without being placed on a parking lot or truck loading/unloading zone, then it would have to be placed up against the exterior south wall of the production building. That wall stands only 68.3 feet from the south property line, so a waste storage area measuring at least twenty feet on a side would still not provide for the 50 foot buffer zone. Furthermore, such an arrangement would create problems with regard to the plant's fire insurance policy.

### III. Local fire code requirements

The applicable local fire code is the 1981 National Fire Protection Association's Flammable and Combustible Liquids Code (NFPA 30 - 1981). The facility is designed to comply with this code and will be evaluated against this code during the local building permit process.

Attached is a layout map which shows the distances between the storage area and surrounding buildings, both on-site and off-site. As can be seen from this map, the nearest building is more than 30 feet away from the facility. At storage capacity, fully 60% of the wastes in the facility will be aqueous, and ignitable liquid wastes could constitute no more than 20% of the inventory. The remaining 20% of the waste inventory would be solid wastes, some or all of which could exhibit ignitable or reactive properties. However, these materials would not exhibit volatility and would be buffered from ignitable liquids by three aisles and two rows of aqueous waste materials, each row being one pallet wide (see attached waste segregation diagram). These measures will serve to limit the potential for fire or violent reaction to spread from one area of the facility to another. Furthermore, the actual potential for ignitability, reactivity, and incompatibility of Olin Water Services wastes is inherently low due to the characteristics of the chemicals used in its line of business. For these reasons, Olin Water Services believes that a setback of 30 or more feet provides an appropriate margin of safety to surrounding buildings. Our long experience with and extensive knowledge of our materials does not permit us to reasonably foresee any circumstances for which such setback would not assure that a fire or sudden release of energy in the facility would not affect surrounding buildings.

The attached letter from Mr. Fred L. Brown, Assistant Fire Marshal, Kansas City, Kansas Fire Department, documents design requirements for the subject facility imposed by the Fire Department. These requirements are, we believe, exceeded in the facility design provided in this permit application (see Section 270.15(a)(1)).

### ATTACHMENTS FOLLOWING:

- 1) Correspondence dated 10/27/81, W. Bradley to R. Bradley (2 pages);
- 2) Correspondence dated 9/24/82, V. Kamath to W. Bradley (1 page);
- 3) Correspondence dated 1/6/83, R. Morby to M. Pelley (1 page);

- 4) Layout map showing distances between storage area and surrounding buildings;
- 5) Waste segregation diagram;
- 6) Correspondence dated 8/7/84, F. Brown to G. Jenkins (1 page).



81 CORPORATE WOODS, 9393 WEST 110TH STREET, OVERLAND PARK, KANSAS 66210 (913) 642-7100

October 27, 1981

Mr. Randy D. Bradley, Div. of Environment  
Hazardous Waste Management Section  
Bureau of Environmental Sanitation  
Topeka, Kansas

Dear Mr. Bradley,

In response to your letter dated 9/11/81, listing (4) items identified by the U.S. E.P.A. that needed to be corrected to bring us in compliance with RCRA Regulations, the following action has been taken.

1. An inspection schedule consistent with the requirements of Sections 265.15 and 265.174 of the RCRA regulations has been prepared and is available for review, an inspection log has also been prepared.
2. Pursuant to Section 260.20 at the RCRA regulations, we would like to petition for a modification of the requirement in Section 265.176 that containers holding ignitable or reactive waste must be located at least 50 feet from the property line of our plant. We think such a modification would be appropriate at our plant for the following reasons:
  - (a) Storage of our containers of ignitable or reactive hazardous waste at least 50 feet from the property line would require that they be inside the production building; this would result in potentially unsafe crowding of the workplace and reduced aisle space available to emergency response personnel and equipment in the event of an emergency.
  - (b) Routine inspections of the drum storage area would detect potential problems before the onset of emergency conditions.
  - (c) The storage of ignitable or reactive drummed waste near the plant property line is no more dangerous than the storage of ignitable or reactive drummed raw or finished goods near the plant property line.
  - (d) If the drummed waste ignitables were moved as far as possible from the property line without being relocated to within the production building, they would still not be 50 feet from the property line, and they would be placed up against the exterior wall of the production building in violation of our property insurance policy.

Mr. Randy D. Bradley

October 27, 1981

(e) If drummed waste ignitables had to be stored inside the production building, then other raw materials or finished goods would be displaced to the outside area; such an arrangement would involve substantial operating inefficiency without any clear gain in waste management safety.

3. Aisle space as required in Section 265.35 has been provided.
4. A contingency plan based on Sections 265.51 - 265.54 has been prepared and is available for review, the local fire department has expressly stated that it does not want a copy of any plant's contingency plan as it would be likely to delay and confuse the response to an emergency.

Sincerely,

*W. W. Bradley*

W. W. Bradley  
Plant Manager  
Olin Water Services

WWB:je

cc: B. Davidoff  
H. Day  
R. S. Hendey  
B. M. Madsen  
J. Sandoval  
M. W. Pelley  
H. Rubenstein  
W. Dame

DEPARTMENT OF HEALTH AND ENVIRONMENT

Joseph F. Harkins, Secretary

Forbes Field  
Topeka, Kansas 66620  
913-852-9350



September 24, 1982

Mr. W. W. Bradley  
Olin Water Services  
3155 Fiberglass Road  
Kansas City, Kansas 66115

Re: Variance Request No. 82-05

Dear Mr. Bradley:

We have reviewed your letter dated August 31, 1982 and the variance request enclosed with it. Considering the circumstances for which you requested the variance, we are exempting you from 40 CFR 265.176 under the authority received by the State of Kansas for administering the hazardous waste management program for Interim Status facilities. This approval is valid until September 30, 1983, at which time we will review the variance to determine if an extension is necessary.

Please note that this approval will exempt you from storage of containers holding ignitable or reactive wastes within at least 15 meters (50 feet) from your property line.

If you have any questions, please feel free to call me.

Sincerely yours,

DIVISION OF ENVIRONMENT

*Vivek Kamath*

Vivek Kamath  
Hazardous Waste Management Section  
Bureau of Environmental Sanitation

VK:cavs  
cc: Randy Bradley

RECEIVED  
OCT 04 1982  
B. M. MADSEN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

JAN 06 1983

Mr. Mark Pelley  
Olin Corporation  
Environmental Affairs Department, 3-F  
120 Long Ridge Road  
Stamford, Connecticut 06904

EPA I.D. NO.: KSD000203638

Dear Mr. Pelley:

This letter confirms the December 30, 1982, telephone conversation with Karen Flournoy of my staff, and yourself regarding the Olin Water Services facility in Kansas City, Kansas.

We have researched your December 28, 1982, inquiry regarding the Kansas Department of Health and Environment (KDHE) variance from the 40 CFR 265.176 requirement for ignitable waste in containers and the Part B permit application. As Mrs. Flournoy advised you on December 30, we request that the Part B application include a discussion of why the requirement of 265.176 cannot be met and propose alternatives to meet the intent of this regulation. We will review this information during the application review process and determine if we can grant a waiver. It is important that we develop written documentation/justification on this issue. You should also discuss local fire codes with regard to storage of ignitable waste in containers. Any further questions on this issue or the Part B application process can be directed to Mrs. Flournoy at (816) 374-6531.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: John Goetz, KDHE

RECEIVED

JAN 10 1983

M. W. PELLEY

APPROXIMATE SCALE  
1" = 50'

8" C.W.M.

8" C.W.M.

12" C.W.M.

D.H.

REICHOLD CHEMICAL  
FILE NO. 848450

N

8" C.W.M.

#3155

A

Office  
&  
Labs.

Office & Labs.

Labs.

Lab.

(1940)  
200'x150'x160'  
x 58'x110'

Mixing  
Rm.

Mixing  
&  
Furnaces

Mixing  
Rm.

2-600 Gal  
365 Mixing Tank

8" H.C.B.

3-15 KVA  
1-25 KVA  
on Poles

68.3'

GATE

6" wire

Expanded Metal  
Flam. Liq.  
Stge

HAZARDOUS WASTE DRUM  
STORAGE AREA (PROPOSED DIMENSIONS)

68'

FIBERGLASS RD

D.H.

REICHOLD CHEMICAL

GARDNER ASPHALT CORP



# CITY OF KANSAS CITY, KANSAS

## FIRE DEPARTMENT

IN REPLY REFER TO  
LAWRENCE D. BOWERS, CHIEF

JOHN E. REARDON, MAYOR

August 7, 1984

Mr. Glen D. Jenkins  
Plant Manager  
Olin Corporation  
3155 Fiberglass  
Kansas City, KS

Dear Mr. Jenkins:

After reviewing the drawing of your companies by-product area, it is the recommendation of this Department that the by-product produced in your manufacturing company are flammable and combustible.

You may be allowed forty (40) barrels each in storing your liquids and solids that are flammable and combustible in order to separate in between, you should store your aqueous barrels.

The storage area should be of cinder blocks on three sides, open top, catch basin, and portable sump pump that will pump spilled produce back into a container.

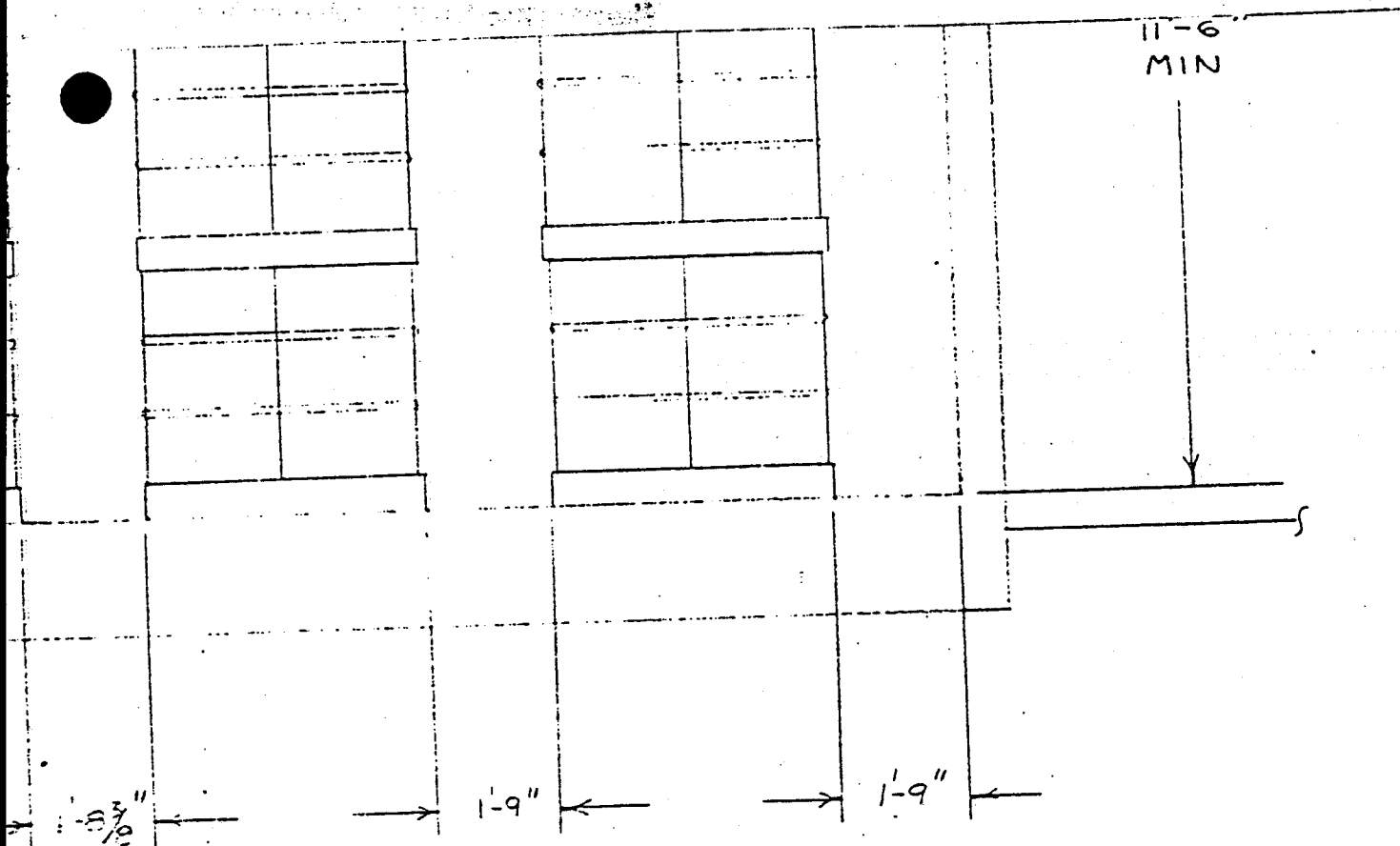
Sincerely,

Fred L. Brown  
Assistant Fire Marshal  
K. C. K. F. D.

FLB/tl



See Part B



-A

OLIN WATER SERVICES		
SCALE: $\frac{3}{8}" = 1'-0"$	APPROVED BY:	DRAWN BY: <i>LDG</i>
DATE: 9/10/84		REVISED
KC WASTE SEGREGATION		DRAWING NUMBER
DIAGRAM		A-122

270.15(d): Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with Subsections 264.177(a) and (b), and 264.17(b) and (c).

I. Sections 264.177(a) and (b): Incompatible wastes, or incompatible wastes and materials, will never be placed into the same container. Each container will be dedicated to a single waste. In addition, containers will not, under any foreseeable circumstances, be reused for waste storage; if ever a container were to be so reused, it would be triple rinsed with a suitable solvent prior to being loaded with any waste not compatible with the prior contents. Likewise, containers will be appropriately triple rinsed prior to initial service for hazardous waste storage if incompatibility of residue is of concern.

II. Sections 264.17(b) and (c): See Section 270.14(b)(9).

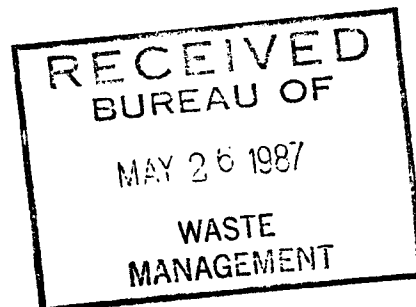


9393 WEST 110TH STREET, P. O. BOX 10918, OVERLAND PARK, KANSAS 66210 (913) 451-3100

May 22, 1987

Hazardous Waste Section  
Bureau of Waste Management  
Kansas Department of Health and Environment  
Forbes Field  
Topeka, Kansas 66620

Attention: Ms. Janel Rogers



Subject: EPAID KSD000203638  
Permit Modifications  
Olin Water Services  
3155 Fiberglas Road  
Kansas City, Kansas

Gentlemen:

This letter is being written to formally request a permit modification pursuant to Subpart D Title 40 of the Code of Federal Regulations.

We are specifically requesting changes under 40 CFR 270.14 - General Inspection Schedule as required by 40 CFR 264.15, and 40 CFR 270.15(a) - Description of containment system.

The revisions we are requesting under the General Inspection Schedule include changes to the inspection frequencies for the following areas:

- 1) Condition of containers - now inspected daily, proposed to be inspected weekly.
- 2) Amount of aisle space between containers - now inspected daily, proposed to be inspected weekly.
- 3) Condition of emergency equipment - now inspected weekly, proposed to be inspected monthly.

May 22, 1987

Our rationale in making the request for the revised inspection frequencies is the reduced burden on operating facility personnel time and record keeping requirements, yet still maintaining the minimum inspection requirements as specified in the Code of Federal Regulations. We also believe that the reduced inspection frequencies will not deteriorate or reduce the integrity, security, and operation of the waste management storage area.

We are including as Attachment I a draft revised General Inspection Schedule with the revised inspection frequencies.

Our second requested modification consists of changing the stacking height description from "pallets may be stacked to three layers" to establishing a maximum height measured in a linear measurement such as feet/inches. Our proposed maximum height is 12 feet. This is the approximate height of 55 gallon drums and pallets stacked three layers high.

Our rationale in making the request is that the original permit conditions were written with the assumption that all waste material would be packaged in 55 gallon drums. During our operating experience we have discovered that not all waste generated is packaged in 55 gallon containers and the three pallet stacking height restriction severely limits and restricts the amount of waste we can place in the containment area and the type of containers that must be used to package the waste in.

By converting to the dimensional specification we believe we can still maintain the intent and purpose of the original permit requirements while increasing the flexibility and operational efficiency of the permitted waste management storage area.

If you require additional information or have further questions regarding the proposed changes, please contact me.

Sincerely,

OLIN WATER SERVICES  
OLIN CORPORATION

  
L. M. Prouty

ELK

Regulatory Affairs Specialist

LMP:gk

cc: Mr. B. Madsen  
Mr. R. Hendey  
Mr. W. Dame

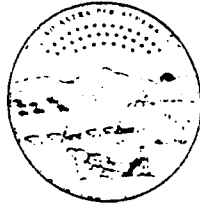
270.14(b)(5): A copy of the general inspection schedule required by Section  
164.15(b)....

## GENERAL INSPECTION SCHEDULE

- I. Procedures and Responsibilities
  - A. General inspection frequency: weekly
  - B. Individuals authorized to conduct inspection in order of alternate service:
    - 1. Production supervisor.
    - 2. Plant manager.
  - C. Inspectors to record observations and date/nature of repairs or other remedial actions on "WASTE AREA INSPECTION LOG" (see attachment).
- II. Items to be inspected and frequency of inspections
  - A. Condition of containers: ~~weekly~~
    - 1. Leaks.
    - 2. Deterioration.
    - 3. Stability of stacking arrangements and condition of pallets.
  - B. Containment System: daily
    - 1. General condition of containment curbs, floor and sump.
    - 2. Condition of sump pump.
  - C. Amount of aisle space between containers: ~~weekly~~
  - D. Condition of emergency equipment: ~~monthly~~
    - 1. Fire hoses and fire extinguishers.
    - 2. Siren alarms.
    - 3. Emergency showers and eye wash stations.
    - 4. Scott Air Packs.
    - 5. Liquid vacuum equipment.
- III. Items inspected by outside contractors/suppliers and frequency of inspections
  - A. Fire hoses and fire extinguishers: yearly
  - B. Sprinkler system: yearly

Attachment: "WASTE AREA INSPECTION LOG" format

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

*Forbes Field*

*Topeka, Kansas 66620-0001*

*Phone (913) 296-1500*

Mike Hayden, Governor

Stanley C. Grant, Ph.D., *Secretary*

Gary K. Hulett, Ph.D., *Under Secretary*

October 23, 1987

Mr. Larry Prouty  
Olin Water Services  
P.O. Box 10918  
Overland Park, Kansas 66210

Re: Kansas City, Kansas Facility  
EPA I.D. Number KSD000203638

Dear Mr. Prouty:

Your May 22, 1987 request for permit modifications pursuant to 40 CFR 270, Subpart D has been reviewed. The requested modifications to the inspection frequencies and to the hazardous waste drum storage stacking height are tentatively approved. Even though the drum stacking height will be altered, the permit will still limit you to a total storage capacity of 200 55-gallon drums. All four rows of drums five pallets deep could not be completely stacked three high even with the modified permit.

In order to complete the major modification procedures, the following pages of the Part B application must be revised:

1. Section 270.14(b)(1), A general description of the facility. In the sentence beginning "Ignitable and reactive wastes...", the word "two" needs to be changed to "three".
2. Section 270.14(b)(5), General inspection schedule. Please change the inspection frequency of the condition of containers to weekly, the inspection frequency of the amount of aisle space between containers to weekly, and the inspection frequency of the condition of emergency equipment to monthly.
3. Section 270.14(b)(5), Inspection log. Page 1. The inspection frequency of the emergency equipment should be changed to monthly.

Page 2. We recommend removing the column for aisle space from the containment system inspection log and placing it on the inspection log for containers.

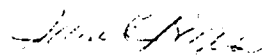
Page 3. The inspection frequency for containers should be changed to weekly.

Mr. Larry Prouty  
Page 2  
October 23, 1987

Once the modified pages are received, we will forward copies of the modifications to the Environmental Protection Agency Region VII for a 15-day period of review and comment. After the 15-day period, we will place only those conditions of your current hazardous waste storage permit which are subject to modification on public notice for 45 days. Upon completion of the 45-day public comment period and if no public comments are received, we would notify you that your hazardous waste storage permit has been modified.

Please submit these revised pages by November 20, 1987. If you have any questions, please contact me at (913) 296-1611.

Sincerely,



Janel J. Rogers  
Environmental Engineer  
Hazardous Waste Section  
Bureau of Waste Management

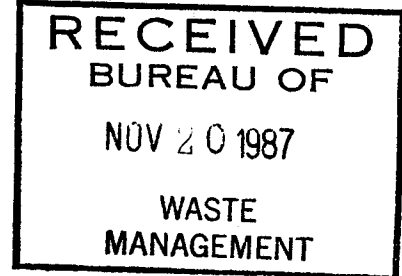
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C James Fischer  
Karen Flournoy



9393 WEST 110TH STREET, P. O. BOX 10918, OVERLAND PARK, KANSAS 66210 (913) 451-3100

November 18, 1987



Hazardous Waste Section  
Bureau of Waste Management  
Kansas Department of Health & Environment  
Forbes Field  
Topeka, Kansas 66620

Attention: Ms. Janel Rogers

Re: Olin Water Services  
Kansas City, Kansas  
EPAID KSD000203638

Dear Ms. Rogers:

In response to your October 23, 1987 correspondence and our subsequent phone conversation please find enclosed the revised Part B application page changes. The changes, according to our discussion, are as follows:

- 1) Section 270.14(b)(1). General description of the facility. - This page has been revised to reflect a linear height limitation versus the number of stacked drums in the present permit.
- 2) Section 270.15(a). Description of containment system. - This page has also been corrected regarding stacking height limitation to make it consistent with 270.14(b)(1).
- 3) Section 270.14(b)(5). General Inspection Schedule. - Frequency of inspection changed as requested.
- 4) Section 270.14(b)(5). Inspection Log. - Changed as requested.

We trust the documents submitted are satisfactory and the requested permit changes will be forwarded to EPA Region VII for review and comments.

Sincerely yours,

OLIN WATER SERVICES  
OLIN CORPORATION

  
L. M. Prouty  
Regulatory Affairs Specialist 

LMP:gk  
cc: Mr. B. Madsen  
cc: Mr. R. Hendey  
cc: Mr. W. Dame

O L I N C O R P O R A T I O N



STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

*Forbes Field*

*Topeka, Kansas 66620-0001*

*Phone (913) 296-1500*

Mike Hayden, *Governor*

Stanley C. Grant, Ph.D., *Secretary*

Gary K. Hulett, Ph.D., *Under Secretary*

November 23, 1987

Ms. Karen Flournoy  
RCRA Permit Section  
Waste Management Division  
U.S. Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Re: Proposed Permit Modifications  
Olin Water Services  
Kansas City, Kansas  
EPA I.D. Number KSD000203633

Dear Ms. Flournoy:

Olin Water Services, Kansas City, Kansas, has requested major modifications to their RCRA hazardous waste storage permit. The revised pages submitted by Olin for the Part B application are enclosed. The changes are as follows:

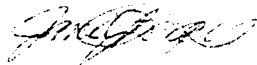
1. Section 270.14(b)(1). General description of the facility. - This page has been revised to reflect a linear height limitation versus the number of stacked drums in the present permit.
2. Section 270.15(a). Description of containment system. - This page has also been corrected regarding stacking height limitation to make it consistent with 270.14(b)(1).
3. Section 270.14(b)(5). General inspection schedule. - The inspection frequency of the condition of containers has been changed to weekly, the inspection frequency of the amount of aisle space between containers has been changed to weekly, and the inspection frequency of the condition of emergency equipment has been changed to monthly.

Ms. Karen Flournoy  
Page 2  
November 23, 1987

4. Section 270.14(b)(5). Inspection log. - The inspection frequency of the emergency equipment log has been change to monthly. The column for aisle space from the containment system inspection log has been placed on the inspection log for containers. The inspection frequency for the containers log has been changed to weekly.

We propose to following the procedures contained in 40 CFR 270.41 for modification of both the existing state and EPA permits for this facility. The modifications are being provided for your 15-day period of review and comment as specified in the EPA-Kansas Transition Plan for RCRA Implementation Under Final Authorization. If we do not receive any comment from your office within fifteen days, we will consider the modifications approved and will proceed to place them on public notice.

Sincerely,



Janel J. Rogers  
Environmental Engineer  
Hazardous Waste Section  
Bureau of Waste Management

dl/olin.jjr  
Enclosures

C James Fischer

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

*Forbes Field*

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, *Governor*

Stanley C. Grant, Ph.D., *Secretary*

Gary K. Hulett, Ph.D., *Under Secretary*

December 18, 1987

Mr. Larry Prouty  
Olin Water Servies - Olin Corporation  
P.O. Box 10918  
Overland Park, Kansas 66210

Re: Olin Water Services - Olin Corporation  
Kansas City, Kansas  
EPA I.D. Number KSD000203639

Dear Mr. Prouty:

The Kansas Department of Health and Environment (KDHE) has made the tentative decision to modify the Resource Conservation and Recovery Act (RCRA) permit issued to Olin Water Services - Olin Corporation in Kansas City, Kansas. Enclosed for your information is a copy of the administrative record which includes the public notice for newspaper, public notice of radio broadcast, modified draft permit, and fact sheet.

On December 18, 1987, a 45-day public comment period on your draft modified permit begins. You are invited to submit written comments during this period, if you wish. On this date, the public notice will be published in the Kansas City Kansan and broadcast over radio stations KFKF (FM) and KCKM (AM). Comments on the proposed permit must be submitted in writing before Feburary 1, 1988 to Mr. John Goetz, Hazardous Waste Section, KDHE, Topeka, Kansas.

A public hearing has not been scheduled; however, if requests are received which indicate a significant degree of public interest in this draft permit, a public hearing will be scheduled. Requests for a public hearing must be received by January 19, 1988.

The KDHE Secretary will make a final decision to modify the permit after consideration of all comments received and of the requirements of all state and federal hazardous waste regulations, statutes, and policies.

Mr. Larry Prouty  
Page 2  
December 18, 1987

We appreciate your cooperation in providing information during the permit review process. Should you have any questions concerning these procedures, please contact me at (913) 296-1611 or Mr. John Goetz at (913) 296-1607.

Sincerely,



Janel J. Rogers  
Environmental Engineer  
Hazardous Waste Section  
Bureau of Waste Management

d1/B14

C Wes Bartley  
James Fischer